Progress Energy

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Serial: PE&RAS 06-005
January 17, 2006

Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

SUBJECT: Comments on Nuclear Energy Institute (NEI) and United Telecom Council (UTC) Request for Waiver of Section 74.832(h) (DA 05-3216, December 16, 2005)

Progress Energy is submitting the following in response to the subject request for comments.

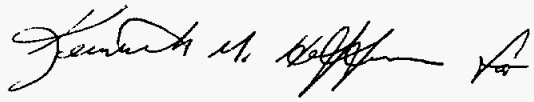
1. Progress Energy fully supports the NEI/UTC request for waiver of the eligibility rules for Low Power Auxiliary Stations (Part 74, Subpart H) so that workers in our nuclear power plants can continue to operate certain wireless headsets and intercom devices. These plants include the Shearon Harris Nuclear Power Plant, Unit No. 1 and the Brunswick Steam Electric Plant, Unit Nos. 1 & 2 in North Carolina; the H.B. Robinson Steam Electric Plant, Unit No. 2 in South Carolina; and the Crystal River Unit No. 3 in Florida.
2. These devices are used primarily, but not exclusively, during outages at our nuclear power plants. The essential performance criteria for this equipment include:
    a. Non-interference with existing site wireless frequencies
    b. Frequency agile capabilities
    c. Multi-accessory configurations
    d. Standardized systems across the fleet which facilitates the sharing of operating experience.
3. Telex systems are used by polar crane operators during the critical activity of removing the reactor head inside the reactor containment building. This involves communications with the crane operator (on the ceiling of the reactor containment) and a worker at the reactor head. These complex lifts of very large objects directly over the fuel rods require a closed communication system to allow the crane operator (who is often unable to maintain visual contact with the item being lifted) to maintain voice contact with spotters at the reactor head.
4. These systems are routinely used for remote communication between workers in high radiation. This remote communication capability facilitates fewer workers having to enter high radiation areas, thereby reducing the amount of exposure at each site.

5. Our nuclear sites are either at or approaching the operational limits of existing installed radio capacity. Security, operations, and maintenance have increased their use of these systems to the point that outages, non-routine critical tasks, and drills are limited in the ability to have access to the system. Several sites are experiencing wait times to transmit. This delay impacts tasks that require real time communications and presents challenges to safety.
6. Each of our sites has identified radio exclusion zones throughout the plant. In some cases, keying radios in these areas has caused inadvertent actuations of electrical equipment.

In summary, we feel that to best be able to protect our workers, as well as the health and safety of the public, the FCC should grant the waiver requested by NEI and UTC.

Please contact me at (919) 546–4579 if you have any questions.

Sincerely,



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BM/kmh